

EXHIBIT 48

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Sameer Anand,

Movant,

v.

Joann LeDoux,

Respondent.

Case No. 1:25-mc-00298

CASE IN OTHER COURT:
No. 3:24-cv-05808-TMC

DECLARATION OF JEN L. BASSETTI

I, Jen L. Bassetti, am over the age of eighteen (18), competent to testify, and make this Declaration regarding the facts and circumstances in this case.

1. I am an independent contract paralegal, employed at Paralegal Litigation Services, LLC, hired by attorney Jocelyn C. Stewart for the *LeDoux v. Outliers, Inc.*, et al. trial.

2. On May 9, 2025, I provided an email to counsel for Mr. Anand, Eric Robert Freiman and Myles K. Bartley, attaching 1) Notice of Intent to Subpoena with 10-days notice and 2) Subpoena for both Sameer Anand and Gabriel Marcial. Both Respondents' counsel were copied on this email with their correct email address.

3. At a Discovery Hearing on June 4, 2025, Judge Cartwright ordered that defense would be required to provide communications and drafts of Mr. Anand's declaration.

DECLARATION OF JEN L. BASSETTI - 1

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Phone: (253) 317-8494

1 4. On June 30, 2025, I caused to be personally served on Sameer Anand a
2 Subpoena to Testify at a Deposition in a Civil Action Directed to Sameer Anand and Notice of
3 Video-Recorded Deposition of Sameer Anand.

4 5. On July 9, 2025, Mr. Bartley sent an email directly to me stating that he had
5 requested a meet and confer, but the email was returned as “could not be delivered”. Both Mr.
6 Abolins and Ms. Stewart were copied on this email with their correct email addresses.

7 6. I was present on Thursday, July 10, 2025, when Respondent’s counsel, Jocelyn
8 Stewart met and conferred with Mr. Myles Bartley, lead counsel for Mr. Anand.

9 7. During that meet and conferral, Mr. Bartley wanted to clarify the scope of the
10 twenty-six (26) document requests on the Subpoena Duces Tecum. Ms. Stewart indicated that
11 the only responsive materials being requested were those that related to Mr. Anand’s
12 declaration and the communications, consistent with the ruling issued by the Court with regard
13 to the Thesis Defendants. Mr. Bartley then asked Ms. Stewart whether she was only looking
14 for six (6) and not the remaining twenty (20) of those requests, which were the same requests
15 that had been subject to Thesis’ Protective Order. Ms. Stewart confirmed his statement was
16 correct.
17

18 8. Further, Mr. Bartley stated to Ms. Stewart that Mr. Anand had related to Mr.
19 Bartley that there were no drafts and there were no responsive materials for those six (6)
20 remaining requests. Mr. Bartley also related to Ms. Stewart that Mr. Anand did not even have
21 the declaration that he signed.
22

23 9. Mr. Bartley indicated he believed no authority existed for the deposition of Mr.
24 Anand who had evidence related to the motion for arbitration, that had since been withdrawn,
25 and that he would file a motion to quash the next day. Mr. Bartley said he wanted to ensure he

1 had communicated this to Ms. Stewart to prevent the necessity for counsel to travel to New
2 York. (Declaration of Jocelyn C. Stewart, **Exh. 48** (“Decl. of Stewart”).)

3 10. In reliance on Mr. Bartley, Ms. Stewart cancelled her travel. (Decl. of Stewart,
4 **Exh. 49**.) When no Motion to Quash was filed or received by our office, Ms. Stewart rebooked
5 travel to depart Seattle on Sunday, for the Monday deposition. (Decl. of Stewart, **Exh. 50**.)

6 11. To my knowledge, Ms. Stewart traveled to New York for the deposition and
7 awaited Mr. Anand’s presence at the location indicated on the Notice of Deposition and
8 Subpoena. (Decl. of Stewart, **Exh. 51**.) Neither Mr. Anand, nor his counsel showed or
9 communicated anything. Ms. Stewart informed me that she was using the time to begin to write
10 a motion for sanctions.
11

12 12. On Monday, July 14, 2025, at 11:37 a.m., after the deposition, attorney Michael
13 W. Held, counsel for Mr. Anand, forwarded an email to Mr. Abolins asking him if he had received
14 a prior purported email. The email did not include lead counsel Jocelyn Stewart or myself as
15 recipients. The email that had been forwarded contained incorrect emails for counsel, and I was
16 not included. (Decl. of Stewart, **Exh. 52**.)

17 13. It is unclear why Movant’s counsel would continue to alternate correct emails and
18 incorrect emails on their correspondence, or leave lead counsel, Jocelyn Stewart, off an email for
19 electronic service of a Motion to Quash, when that is the only counsel they met with for a meet
20 and confer four days prior.
21

22 14. Ms. Stewart forwarded the email that Mr. Held separately sent her purporting to
23 ask her if she had received the motion to quash that he sent on Saturday. Our legal team conducted
24 an internal audit and could locate no emails from Mr. Held to Ms. Stewart. The email Mr. Held
25 allegedly sent to Mr. Abolins was not a valid email address that exists.

DECLARATION OF JEN L. BASSETTI - 3

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1 I declare under penalty of perjury under the laws of the state of Washington that the
2 foregoing is true and correct.

3 DATED this 23rd day of July, 2025 in Monroe, Washington.
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6 Jen L. Bassetti
7 Litigation Paralegal
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